

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE
PLAINTIFFS' SUPPLEMENTAL EXPERT REPORTS AND OPINIONS**

PLAINTIFFS' EXHIBIT 1

April 22, 2020 Email From Defendants' Counsel Chris Boynton to Plaintiffs'
Counsel Regarding the Deposition of Plaintiffs' Expert Dr. Doug Spencer

Friday, July 31, 2020 at 09:08:02 Central Daylight Time

Subject: RE: Holloway v. City of Virginia Beach - Plaintiffs' Supplemental Disclosure Pursuant to Federal Rule of Civil Procedure 26(e)

Date: Wednesday, April 22, 2020 at 3:11:44 PM Central Daylight Time

From: Christopher S. Boynton <CBoynton@vbgov.com>

To: Annabelle Harless <aharless@campaignlegalcenter.org>, Joseph M. Kurt <jKurt@vbgov.com>, Gerald L. Harris <GLHarris@vbgov.com>

CC: Gerry Hebert <ghebert@campaignlegalcenter.org>, Christopher Lamar <CLamar@campaignlegalcenter.org>, Ruth Greenwood <rgreenwood@campaignlegalcenter.org>, Danielle Lang <dlang@campaignlegalcenter.org>, Jeff Zalesin <jzalesin@campaignlegalcenter.org>, Simone Leeper <SLeeper@campaignlegalcenter.org>

Attachments: image001.png

Annabelle, Gerry et al.,

Having digested the Supplemental Disclosure provided on March 27, 2020, we would like to depose Dr. Spencer as to his Supplemental Expert Report (dated March 16, 2020), which we propose to take remotely via videographic and stenographic means. Please provide Dr. Spencer's and counsel's available dates for that deposition. For now, we are reserving the right to depose Mr. Fairfax as to his Supplemental Report, but are not asking to schedule that deposition at the current time.

With kind regards,

Chris Boynton



Christopher S. Boynton
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From: Annabelle Harless <aharless@campaignlegalcenter.org>
Sent: Friday, March 27, 2020 2:34 PM
To: Christopher S. Boynton <CBoynton@vbgov.com>; Joseph M. Kurt <jKurt@vbgov.com>; Gerald L. Harris <GLHarris@vbgov.com>
Cc: Gerry Hebert <ghebert@campaignlegalcenter.org>; Christopher Lamar <CLamar@campaignlegalcenter.org>; Ruth Greenwood <rgreenwood@campaignlegalcenter.org>; Danielle Lang <dlang@campaignlegalcenter.org>; Jeff Zalesin <jzalesin@campaignlegalcenter.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>
Subject: Holloway v. City of Virginia Beach - Plaintiffs' Supplemental Disclosure Pursuant to Federal Rule of Civil Procedure 26(e)

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Counsel,

Pursuant to Federal Rule of Civil Procedure 26(e), attached is Anthony Fairfax's updated CV.

Best,

Annabelle

Annabelle Harless

Senior Legal Counsel, Voting Rights & Redistricting

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